

May 7, 2004

Agency for Health Care Quality and Research Docket 2004S-0170 Medicare Prescription Drug, Improvement, and Modernization Act Section 1013: Suggest Priority Topics for Research

To Whom it May Concern:

The National Association of Chain Drug Stores (NACDS) is writing to suggest topics for the highest priorities for research, demonstrations, and evaluation projects to support and improve the Medicare, Medicaid, and S-CHIP programs. This research agenda is supposed to be developed pursuant to the Medicare Modernization Act (MMA) of 2003.

NACDS represents more than 200 chain pharmacy companies that operate nearly 35,000 community retail pharmacies. We are the primary providers of outpatient pharmacy services in the United States, and will be the primary providers of pharmacy services under the new Medicare Part D program.

413 North Lee Street P.O. Box 1417-D49 Alexandria, Virginia 22313-1480 We believe that AHRQ should include among its priorities an evaluation of the quality of care improvements resulting from medication therapy management (MTM) services provided by pharmacists. This evaluation could be done by using results from existing Medicaid programs, as well as private sector programs, such as Project Impact, and the Asheville Project. An evaluation and assessment of these programs will help CMS and Part D plans structure the new Medicare MTM programs.

Significant evidence already indicates that medication therapy management services can significantly improve overall health care outcomes and reduce costs, especially for individuals taking multiple medications. The MMA requires that Part D plans provide these MTM services beginning in 2006. There are various MTM models that are used in practice today, and Part D and Medicare Advantage plans could benefit from knowing which MTM programs provide the best outcomes in terms of improving medication use and health outcomes.

We appreciate your consideration of this request, and ask that you contact us for more information about the various MTM programs that are in operation that can help move this potential research project forward. Thank you.

Sincerely,

John M. Coster, Ph.D., R.Ph.

John M. Corter